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*Special Litigation Counsel for Debtors and
Plaintiffs Celsius Network Limited and Celsius Network LLC*

**UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:

CELSIUS NETWORK LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 22-10964 (MG)

(Jointly Administered)

Re: ECF Nos. 2758, 2772

**CERTIFICATE OF NO OBJECTION TO MOTION TO APPROVE THE TRANSFER OF
PROPERTY PURSUANT TO BANKRUPTCY CODE SECTION 105 AND RULE 9019
OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE**

Pursuant to 28 U.S.C. § 1746 and Rule 9075-2 of the Local Bankruptcy Rules for the
Southern District of New York (the “Local Rules”), the undersigned special litigation counsel for

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Celsius Network LLC (2148); Celsius KeyFi LLC (4414); Celsius Lending LLC (8417); Celsius Mining LLC (1387); Celsius Network, Inc. (1219); Celsius Network Limited (8554); Celsius Networks Lending LLC (3390); Celsius US Holding LLC (7956); GK8 Ltd. (1209); GK8 UK Limited (0893) and GK8 USA LLC (9450). The location of Debtor Celsius Network LLC’s principal place of business and the Debtors’ service address in these chapter 11 cases is 50 Harrison Street, Suite 209F, Hoboken, New Jersey 07030.

Celsius Network LLC and certain of its affiliates, as debtors and debtors in possession (collectively, the “Debtors”) in the above-captioned chapter 11 cases (the “Chapter 11 Cases”), hereby certify as follows:

1. On June 6, 2023, Celsius Network LLC and Celsius Network Limited (together, “Celsius”), debtors in the Chapter 11 Cases, filed the *Motion to Approve the Transfer of Property Pursuant to Bankruptcy Code Section 105 and Rule 9019 of the Federal Rules of Bankruptcy Procedure* [ECF No. 2758] (the “Motion”),² seeking entry of an order pursuant to Bankruptcy Code section 105 and in furtherance of the *Stipulation to Settle and Discontinue Adversary Proceeding* entered among: (i) Celsius Network Limited, (ii) Celsius Network LLC and (iii) Prime Trust, LLC, and approved by this Court on December 6, 2022 pursuant to Bankruptcy Rule 9019(a) in the adversary proceeding styled, *Celsius Network Limited and Celsius Network LLC v. Prime Trust, LLC*, Adv. Proc. No. 22-01140 (MG).

2. On June 7, 2023, Celsius filed an amended notice providing that the hearing would take place in a hybrid live and Zoom format. [ECF No. 2772.]

3. Objections or responses to the Motion were required to be filed and served by 4:00 p.m. (prevailing Eastern Time) on June 21, 2023 (the “Objection Deadline”). The Motion provided that the relief requested therein may be granted, pursuant to Local Rule 9074-1(b)(1)(K), without a hearing if no objection was timely filed and served in accordance with the Case Management Order.

4. The Objection Deadline has passed, and to the best of the knowledge of the undersigned special litigation counsel to the Debtors, no objection or response to the Motion has been filed on the docket of these Chapter 11 Cases or served on Akin. In accordance with Local

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

Rule 9075-2, this Certificate of No Objection is being filed at least forty-eight hours after expiration of the Objection Deadline.

5. Accordingly, the Debtors respectfully request entry of the proposed order, attached hereto as **Exhibit A**, at the Court's earliest convenience.

Dated: June 26, 2023
New York, New York

AKIN GUMP STRAUSS HAUER & FELD LLP

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